

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

| | | |
|--------------------------|---|---------------------------------|
| UNITED STATES OF AMERICA |) | CRIMINAL NO. 04-10114-DPW |
| |) | |
| v. |) | VIOLATIONS: |
| |) | 21 U.S.C. § 846 -- Conspiracy |
| 1. ANTONIO CARDONA, |) | to Distribute Cocaine Base |
| a/k/a "ANT," and |) | |
| |) | 21 U.S.C. § 841(a)(1) -- |
| 2. JEROME LASSITER, |) | Distribution of Cocaine |
| a/k/a "BUTTA," |) | Base |
| |) | |
| Defendants. |) | 18 U.S.C. § 2 -- |
| |) | Aiding and Abetting |
| |) | |
| |) | 21 U.S.C. § 860(a) - Playground |
| |) | Zone Violation |
| |) | |
| |) | 21 U.S.C. § 861(a) - Use of a |
| |) | Juvenile |

SUPERSEDING INDICTMENT

COUNT ONE: (21 U.S.C. § 846 -- Conspiracy to Distribute Cocaine Base; 21 U.S.C. § 860(a) -- Playground Zone Violation)

The Grand Jury charges that:

On or about June 19, 2003, in the District of Massachusetts,

1. ANTONIO CARDONA, a/k/a "ANT," and
2. JEROME LASSITER, a/k/a "BUTTA,"

defendants herein, did knowingly and intentionally combine, conspire, confederate and agree with each other to possess with intent to distribute, and to distribute, a quantity of cocaine base, also known as "crack," a Schedule II controlled substance, within 1,000 feet of the real property comprising the Little Scobie Playground, in violation of Title 21, United States Code,

Sections 841(a)(1), 841(b)(1)(C) and 860(a).

All in violation of Title 21, United States Code, Section 846.

COUNT TWO: (21 U.S.C. § 841(a)(1) -- Distribution of Cocaine Base; 21 U.S.C. § 860(a) -- Playground Zone Violation; 18 U.S.C. § 2 -- Aiding and Abetting)

The Grand Jury further charges that:

On or about June 19, 2003, at Boston, in the District of Massachusetts,

1. ANTONIO CARDONA, a/k/a "ANT," and
2. JEROME LASSITER, a/k/a "BUTTA,"

defendants herein, did knowingly and intentionally possess with intent to distribute, and did distribute, a quantity of cocaine base, also known as "crack," a Schedule II controlled substance, within 1,000 feet of the real property comprising the Little Scobie Playground.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and 860(a), and Title 18, United States Code, Section 2.

COUNT THREE: (21 U.S.C. § 841(a)(1) -- Distribution of Cocaine Base; 21 U.S.C. § 860(a) -- Playground Zone Violation)

The Grand Jury further charges that:

On or about July 1, 2003, at Boston, in the District of Massachusetts,

1. JEROME LASSITER, a/k/a "BUTTA,"

defendant herein, did knowingly and intentionally possess with intent to distribute, and did distribute, a quantity of cocaine base, also known as "crack," a Schedule II controlled substance, within 1,000 feet of the real property comprising the Little Scobie Playground.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and 860(a).

COUNT FOUR: (21 U.S.C. § 841(a)(1) -- Distribution of Cocaine Base; 21 U.S.C. § 860(a) -- Playground Zone Violation; 21 U.S.C. § 861(a) -- Use of a Juvenile)

The Grand Jury further charges that:

On or about July 23, 2003, at Boston, in the District of Massachusetts,

1. **ANTONIO CARDONA, a/k/a "ANT,"**

defendant herein, did knowingly and intentionally possess with intent to distribute, and did distribute, a quantity of cocaine base, also known as "crack," a Schedule II controlled substance, within 1,000 feet of the real property comprising the Little Scobie Playground and, in so doing, defendant, being a person at least eighteen years of age, did knowingly and intentionally employ, hire, use, persuade, induce and entice a person, who was then under eighteen years of age, to violate Title 21, Section 841(a)(1).

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), 860(a) and 861(a).

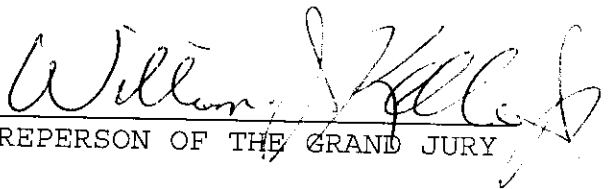
Notice Of Additional Factors

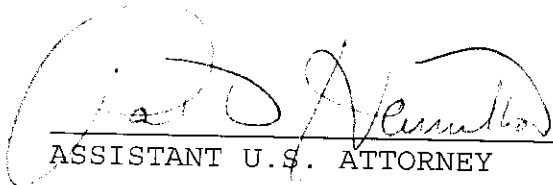
The Grand Jury further charges that:

1. Defendant Antonio Cardona, a/k/a "Ant," is responsible for at least 1, but less than 2, grams of cocaine base, also known as "crack" cocaine. Accordingly, U.S.S.G. § 2D1.1(c)(11) applies to this defendant.

2. Defendant Jerome Lassiter, a/k/a "Butta," is responsible for at least 2, but less than 3, grams of cocaine base, also known as "crack" cocaine. Accordingly, U.S.S.G. § 2D1.1(c)(10) applies to this defendant.

A TRUE BILL


FOREPERSON OF THE GRAND JURY


ASSISTANT U.S. ATTORNEY

DISTRICT OF MASSACHUSETTS: October 28, 2004

Returned into the District Court by the Grand Jurors and
filed.

DEPUTY CLERK

Criminal Case Cover Sheet

U.S. District Court - District of Massachusetts

Place of Offense: _____ Category No. II Investigating Agency DEA

City Boston

Related Case Information:

County Suffolk

Superseding Ind./ Inf. X Case No. 04-10114-DPW
Same Defendant X New Defendant _____
Magistrate Judge Case Number _____
Search Warrant Case Number _____
R 20/R 40 from District of _____

Defendant Information:

Defendant Name Antonio Cardona Juvenile: ☐ Yes ☒ No

Alias Name Ant

Address 93 River Street, Mattapan, MA

Birthdate: 1983 SS # -0384 Sex: Male Race Hispanic Nationalit US

Defense Counsel if known: Edward P. Ryan, Jr. Address 61 Academy

Bar Number _____ Fitchburg, MA 01420

U.S. Attorney Information:

AUSA Patrick M. Hamilton Bar Number if applicable _____

Interpreter: Yes ☒ No ☐ List language and/or dialect: _____

Matter to be SEALED: Yes ☒ No ☐

Warrant Requested ☐ Regular Process ☒ In Custody

Location Status:

Arrest Date April 15, 2004

X Already in Federal Custody as of 4/15/04 in Plymouth

Already in State Custody _____ Serving Sentence ☐ Awaiting Trial

☐ On Pretrial Release: Ordered by: _____ on _____

Charging Document: Complaint ☐ Information ☒ Indictment

Total # of Counts: ☐ Petty _____ ☐ Misdemeanor _____ X Felony 3

Continue on Page 2 for Entry of U.S.C. Citations

☐ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.

Date: October 28, 2004

Signature of AUSA:

Patrick M. Hamilton

District Court Case Number (To be filled in by deputy clerk): _____

Name of Defendant Antonio Cardona

U.S.C. Citations

| | <u>Index Key/Code</u> | <u>Description of Offense Charged</u> | <u>Count Numbers</u> |
|--------|---|---|----------------------|
| Set 1 | <u>21 U.S.C. §§ 846</u> <u>and 860(a)</u> | <u>Conspiracy to distribute cocaine base in a</u> <u>playground zone</u> | <u>1</u> |
| Set 2 | <u>21 U.S.C. § 841(a)(1)</u> <u>and 860(a)</u> | <u>Distribution of cocaine base in a playground zone</u> | <u>2 and 4</u> |
| Set 3 | <u>18 U.S.C. § 2</u> | <u>Aiding and abetting</u> | <u>2</u> |
| Set 4 | <u>21 U.S.C. § 861(a)</u> | <u>Use of a juvenile in a drug offense</u> | <u>4</u> |
| Set 5 | _____ | _____ | _____ |
| Set 6 | _____ | _____ | _____ |
| Set 7 | _____ | _____ | _____ |
| Set 8 | _____ | _____ | _____ |
| Set 9 | _____ | _____ | _____ |
| Set 10 | _____ | _____ | _____ |
| Set 11 | _____ | _____ | _____ |
| Set 12 | _____ | _____ | _____ |
| Set 13 | _____ | _____ | _____ |
| Set 14 | _____ | _____ | _____ |
| Set 15 | _____ | _____ | _____ |

ADDITIONAL INFORMATION: _____

Criminal Case Cover Sheet

U.S. District Court - District of Massachusetts

Place of Offense: _____ Category No. II Investigating Agency DEA

City Boston

Related Case Information:

County Suffolk

Superseding Ind./ Inf. X Case No. 04-10114-DPW
Same Defendant X New Defendant _____
Magistrate Judge Case Number _____
Search Warrant Case Number _____
R 20/R 40 from District of _____

Defendant Information:

Defendant Name Jerome Lassiter Juvenile: ☐ Yes ☒ No

Alias Name Butta

Address 53 Ashton Street, #1, Dorchester, MA

Birthdate: 1984 SS # -0739 Sex: Male Race African-American Nationalit US

Defense Counsel if known: John H. Cunha, Jr. Address One State Street

Bar Number _____ Boston, MA 02109

U.S. Attorney Information:

AUSA Patrick M. Hamilton Bar Number if applicable _____

Interpreter: Yes ☒ No ☐ List language and/or dialect: _____

Matter to be SEALED: Yes ☒ No ☐

Warrant Requested ☐ Regular Process ☒ In Custody

Location Status:

Arrest Date 4/15/04

☒ Already in Federal Custody as of 4/15/04 in Plymouth
Already in State Custody Serving Sentence ☐ Awaiting Trial
☐ On Pretrial Release: Ordered by: _____ on _____

Charging Document: Complaint ☐ Information ☒ Indictment

Total # of Counts: ☐ Petty ☐ Misdemeanor ☒ Felony 3

Continue on Page 2 for Entry of U.S.C. Citations

☐ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.

Date: October 28, 2004

Signature of AUSA: _____

Patrick M. Hamilton

District Court Case Number (To be filled in by deputy clerk): _____

Name of Defendant Jerome Lassiter

U.S.C. Citations

| | <u>Index Key/Code</u> | <u>Description of Offense Charged</u> | <u>Count Numbers</u> |
|--------|---|---|----------------------|
| Set 1 | <u>21 U.S.C. §§ 846</u> <u>and 860(a)</u> | <u>Conspiracy to distribute cocaine base in a</u> <u>playground zone</u> | <u>1</u> |
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| Set 3 | <u>18 U.S.C. § 2</u> | <u>Aiding and abetting</u> | <u>2</u> |
| Set 4 | _____ | _____ | _____ |
| Set 5 | _____ | _____ | _____ |
| Set 6 | _____ | _____ | _____ |
| Set 7 | _____ | _____ | _____ |
| Set 8 | _____ | _____ | _____ |
| Set 9 | _____ | _____ | _____ |
| Set 10 | _____ | _____ | _____ |
| Set 11 | _____ | _____ | _____ |
| Set 12 | _____ | _____ | _____ |
| Set 13 | _____ | _____ | _____ |
| Set 14 | _____ | _____ | _____ |
| Set 15 | _____ | _____ | _____ |

ADDITIONAL INFORMATION: _____

